REMARKS

Claims 1-3 and 5 are rejected under 35 USC 102(e) as being anticipated by Hirota, U.S. Patent No. 6,559,976. This rejection is respectfully traversed.

Claim 1 recites "an input device for inputting distortion data of the exposure unit" and "a controller which controls an exposure position of an image to be exposed by the exposure unit, based on the input distortion data." Hirota fails to teach or suggest these features.

The Examiner asserts that the imaging units 302c, 302m, 302y and 302k correspond to the claimed exposure unit. This is incorrect. Hirota teaches that data from the image reader 200 is sent to controllers (not shown) for exposure heads (col. 3, lines 36-39). Each exposure head controller allows a laser diode to emit a light beam, which is then scanned by a polygon mirror 301 (col. 3, lines 39-43). The photoconductors in imaging units 302c, 302m, 302y and 302k are then exposed to the light (col. 3, lines 43-44). Elements 302c, 302m, 302y and 302k do not correspond to the claimed exposure unit (as asserted by the Examiner), but rather the corresponding element is not shown in Hirota. This is important because the claimed input device for inputting distortion data of the exposure unit actually inputs data which relates to the distortion of the light emitting elements (in the exposure unit), as described in the specification at pg. 2, line 11 to pg. 4, line 16.

Hirota discloses a device similar to that of the prior art discussed in the Background of the Invention of this application. At pg. 2, lines 4-10, Applicants explained that in known prior art tandem color printing systems, where images are formed in an image forming unit for each color (302c, 302m, 302y and 302k of Hirota), it is necessary to detect an error between image forming positions of each of the image forming units and to correct the image data. Hirota makes a similar disclosure at col. 6, lines 6-13, where Hirota teaches that color shift due to the difference in parallelism between the arrangement of the photoconductors and the laser scan is corrected by correcting the position and the images for the C, M, Y and K data (col. 6, lines 13-15). In a manner similar to the prior art device discussed in this application, Hirota uses resist detection to determine the amounts of color shift of the C, M and Y components from the K component (col. 6, lines 57-59). Hirota discloses that main scan magnification distortion, subscan bow distortion and skew

distortion of the C, M and Y components are corrected "by means of the interpolation by a density distribution in accordance with the result of the color shift detection" (col. 6, lines 61-66). As with the prior art discussed in this application (see pg. 3, lines 18-23), Hirota does not teach correcting for distortion of the exposure unit (i.e., the LED head) itself. Since elements 302c, 302m, 302y and 302k do not correspond to the claimed exposure unit, it cannot be said that Hirota determines a distortion of the exposure unit. Rather, as discussed above, Hirota determines different kinds of distortion, which the Examiner interprets to correspond to the claimed distortion. The Examiner is respectfully mistaken. Hirota never discusses determining a distortion of the exposure unit.

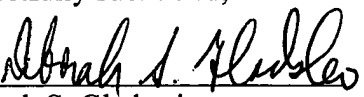
Since Hirota fails to teach determining the distortion of the exposure unit, it cannot possibly teach controlling the exposure position of the image to be exposed by the exposure unit, based on the distortion data of the exposure unit. Accordingly, Hirota fails to teach or suggest the features of claim 1.

Claims 2, 3 and 5 are allowable at least due to their respective dependencies. Applicants request that this rejection be withdrawn.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 325772022400.

Dated: January 25, 2006

Respectfully submitted,

By 

Deborah S. Gladstein
Registration No.: 43,636
MORRISON & FOERSTER LLP
1650 Tysons Blvd, Suite 300
McLean, Virginia 22102
(703) 760-7753